

June 15, 2022

U.S. DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

SK:TBM/CWB

F. #2021R01073/NY-NYE-0913

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

1:22-cr-00106(LDH)(RML)

UNITED STATES OF AMERICA

- against -

MARCUS RICKETTS,
also known as "Darnell Dogan,"
"Conroy Cornelius" and "Blaise,"
MARK GOULBOURNE,
also known as "Short Man,"
JUVANIE CROSSGILL,
also known as "Geo,"
JONATHAN GOULBOURNE,
also known as "Bobcat,"
ROMEO JONAS,
also known as "Tee,"
AMARI WEBBER,
also known as "Smooth," and
CHEVONNE WILLIAMS,
also as "Chevy,"

Defendants.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Hobbs Act Robbery Conspiracy)

1. In or about and between July 2020 and December 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MARCUS RICKETTS, also known as "Darnell Dogan," "Conroy Cornelius" and "Blaise," MARK GOULBOURNE, also known as "Short Man," JONATHAN GOULBOURNE, also known as "Bobcat," ROMEO JONAS, also known as "Tee," AMARI WEBBER, also

S U P E R S E D I N G
I N D I C T M E N T

Cr. No. 22-106 (S-1) (LDH)
(T. 18, U.S.C., §§ 924(c)(1)(A)(i),
924(c)(1)(A)(ii), 924(c)(1)(A)(iii),
924(d)(1), 924(j)(1), 981(a)(1)(C),
1512(c)(1), 1512(c)(2), 1951(a), 3, 2 and
3551 et seq.; T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(B)(vii), 841(b)(1)(C),
841(b)(1)(D), 846, 853(a) and 853(p); T.
28, U.S.C., § 2461(c))

known as “Smooth,” and CHEVONNE WILLIAMS, also known as “Chevy,” together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by the robbery of one or more employees of marijuana-trafficking businesses.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT TWO

(Conspiracy to Distribute and Possess with Intent to Distribute Marijuana)

2. In or about and between July 2020 and December 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MARCUS RICKETTS, also known as “Darnell Dogan,” “Conroy Cornelius” and “Blaise,” MARK GOULBOURNE, also known as “Short Man,” JONATHAN GOULBOURNE, also known as “Bobcat,” ROMEO JONAS, also known as “Tee,” AMARI WEBBER, also known as “Smooth,” and CHEVONNE WILLIAMS, also known as “Chevy,” together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of marijuana involved in the conspiracy attributable to each defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, was 100 kilograms or more of a substance containing marijuana.

(Title 21, United States Code, Sections 846 and 841(b)(1)(B)(vii); Title 18, United States Code, Sections 3551 et seq.)

COUNT THREE
(Hobbs Act Robbery)

3. On or about July 6, 2020, within the Eastern District of New York and elsewhere, the defendants MARCUS RICKETTS, also known as “Darnell Dogan,” “Conroy Cornelius” and “Blaise,” and JONATHAN GOULBOURNE, also known as “Bobcat,” together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of one or more employees of a marijuana-trafficking business in the Bronx, New York.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT FOUR
(Possession with Intent to Distribute Marijuana)

4. On or about July 6, 2020, within the Southern District of New York, the defendants MARCUS RICKETTS, also known as “Darnell Dogan,” “Conroy Cornelius” and “Blaise,” and JONATHAN GOULBOURNE, also known as “Bobcat,” together with others, did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18,
United States Code, Sections 2 and 3551 et seq.)

COUNT FIVE
(Possessing and Brandishing a Firearm)

5. On or about July 6, 2020, within the Eastern District of New York and elsewhere, the defendants MARCUS RICKETTS, also known as “Darnell Dogan,” “Conroy Cornelius” and “Blaise,” and JONATHAN GOULBOURNE, also known as “Bobcat,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a crime of violence and drug trafficking crimes, to wit: the crimes charged in Counts

Two, Three and Four, and did knowingly and intentionally possess such firearms in furtherance of said crime of violence and drug trafficking crimes, one or more of which firearms was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 2 and 3551 et seq.)

COUNT SIX
(Hobbs Act Robbery)

6. On or about October 16, 2021, within the Eastern District of New York and elsewhere, the defendants MARCUS RICKETTS, also known as “Darnell Dogan,” “Conroy Cornelius” and “Blaise,” MARK GOULBOURNE, also known as “Short Man,” JONATHAN GOULBOURNE, also known as “Bobcat,” and ROMEO JONAS, also known as “Tee,” together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of one or more employees of a marijuana-trafficking business in Staten Island, New York.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT SEVEN
(Possession with Intent to Distribute Marijuana)

7. On or about October 16, 2021, within the Eastern District of New York and elsewhere, the defendants MARCUS RICKETTS, also known as “Darnell Dogan,” “Conroy Cornelius” and “Blaise,” MARK GOULBOURNE, also known as “Short Man,” JONATHAN GOULBOURNE, also known as “Bobcat,” and ROMEO JONAS, also known as “Tee,” together with others, did knowingly and intentionally possess with intent to distribute a controlled

substance, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT EIGHT
(Possessing and Brandishing a Firearm)

8. On or about October 16, 2021, within the Eastern District of New York and elsewhere, the defendants MARK GOULBOURNE, also known as “Short Man,” and ROMEO JONAS, also known as “Tee,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a crime of violence and drug trafficking crimes, to wit: the crimes charged in Counts Two, Six and Seven, and did knowingly and intentionally possess such firearms in furtherance of said crime of violence and drug trafficking crimes, one or more of which firearms was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 2 and 3551 et seq.)

COUNT NINE
(Hobbs Act Robbery)

9. On or about December 3, 2021, within the Eastern District of New York and elsewhere, the defendants MARCUS RICKETTS, also known as “Darnell Dogan,” “Conroy Cornelius” and “Blaise,” MARK GOULBOURNE, also known as “Short Man,” JONATHAN GOULBOURNE, also known as “Bobcat,” ROMEO JONAS, also known as “Tee,” AMARI WEBBER, also known as “Smooth,” and CHEVONNE WILLIAMS, also known as “Chevy,” together with others, did knowingly and intentionally obstruct, delay and affect commerce, and

the movement of articles and commodities in commerce, by robbery, to wit: the robbery of one or more employees of a marijuana-trafficking business in Brooklyn, New York.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT TEN

(Possession with Intent to Distribute Marijuana)

10. On or about December 3, 2021, within the Eastern District of New York and elsewhere, the defendants MARCUS RICKETTS, also known as “Darnell Dogan,” “Conroy Cornelius” and “Blaise,” MARK GOULBOURNE, also known as “Short Man,” JONATHAN GOULBOURNE, also known as “Bobcat,” ROMEO JONAS, also known as “Tee,” AMARI WEBBER, also known as “Smooth,” and CHEVONNE WILLIAMS, also known as “Chevy,” together with others, did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved 50 kilograms or more of a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT ELEVEN

(Possessing, Brandishing and Discharging a Firearm)

11. On or about December 3, 2021, within the Eastern District of New York and elsewhere, the defendants MARCUS RICKETTS, also known as “Darnell Dogan,” “Conroy Cornelius” and “Blaise,” MARK GOULBOURNE, also known as “Short Man,” and JONATHAN GOULBOURNE, also known as “Bobcat,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a crime of violence and drug trafficking crimes, to wit: the crimes charged in Counts Two, Nine and Ten, and did

knowingly and intentionally possess such firearms in furtherance of said crime of violence and drug trafficking crimes, one or more of which firearms was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT TWELVE
(Causing Death Through Use of a Firearm)

12. On or about December 3, 2021, within the Eastern District of New York and elsewhere, the defendants MARCUS RICKETTS, also known as “Darnell Dogan,” “Conroy Cornelius” and “Blaise,” and MARK GOULBOURNE, also known as “Short Man,” together with others, in the course of a violation of Title 18, United States Code, Section 924(c), to wit: the use of a firearm during and in relation to a crime of violence and drug trafficking crimes, to wit: the crimes charged in Counts Two, Nine and Ten, did knowingly and intentionally cause the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111(a), in that RICKETTS and MARK GOULBOURNE, together with others, with malice aforethought, did unlawfully kill, and cause the killing of, John Doe, an individual whose identity is known to the Grand Jury, willfully, deliberately, maliciously and with premeditation.

(Title 18, United States Code, Sections 924(j)(1), 2 and 3551 et seq.)

COUNT THIRTEEN
(Accessory After the Fact)

13. On or about December 3, 2021, within the Eastern District of New York and elsewhere, the defendant JUVANIE CROSSGILL, also known as “Geo,” together with others, knowing that one or more offenses against the United States had been committed, to wit: the crimes charges in Counts Two, Ten and Eleven, did knowingly and intentionally receive,

relieve, comfort and assist one or more offenders, in order to hinder and prevent the offenders' apprehension, trial and punishment.

(Title 18, United States Code, Sections 3 and 3551 et seq.)

COUNT FOURTEEN

(Obstruction and Attempted Obstruction of an Official Proceeding)

14. On or about February 10, 2022, within the Eastern District of New York and elsewhere, the defendant JONATHAN GOULBOURNE, also known as "Bobcat," did knowingly, intentionally and corruptly: (a) alter, destroy, mutilate and conceal one or more records, documents and other objects, to wit: a cellular telephone with International Mobile Equipment Identity number 354660119232414, and the files contained therein, and attempt to do so, with the intent to impair such items' integrity and availability for use in an official proceeding, to wit: a proceeding before a federal grand jury in the Eastern District of New York relating to the commission and possible commission of one or more robbery, drug and firearms offenses (the "Grand Jury Investigation"); and (b) obstruct, influence and impede an official proceeding, to wit: the Grand Jury Investigation, and attempt to do so.

(Title 18, United States Code, Sections 1512(c)(1), 1512(c)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE, THREE, SIX AND NINE

15. The United States hereby gives notice to the defendants charged in Counts One, Three, Six and Nine that, upon their conviction of any of such offenses, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offenses; and (b) Title 18, United States Code, Section

924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any violation of any other criminal law of the United States, including but not limited to: (i) six thousand five hundred seventy-eight dollars and twenty-three cents (\$6,578.23), (ii) one .380 Walther semiautomatic pistol bearing serial number S039632, (iii) one .40 caliber Beretta semiautomatic pistol with a defaced serial number, (iv) one .380 caliber Ruger semiautomatic pistol bearing serial number 372256324 and (v) one .40 caliber Sig Sauer semiautomatic pistol with a defaced serial number, all seized on or about December 3, 2021 in Brighton Beach, Brooklyn, New York.

16. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS TWO, FOUR, SEVEN AND TEN

17. The United States hereby gives notice to the defendants charged in Counts Two, Four, Seven and Ten that, upon their conviction of any of such offenses, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including but not limited to: (i) six thousand five hundred seventy-eight dollars and twenty-three cents (\$6,578.23), (ii) one .380 Walther semiautomatic pistol bearing serial number S039632, (iii) one .40 caliber Beretta semiautomatic pistol with a defaced serial number, (iv) one .380 caliber Ruger semiautomatic pistol bearing serial number 372256324 and (v) one .40 caliber Sig Sauer semiautomatic pistol with a defaced serial number, all seized on or about December 3, 2021 in Brighton Beach, Brooklyn, New York.

18. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS FIVE, EIGHT, ELEVEN, TWELVE AND THIRTEEN

19. The United States hereby gives notice to the defendants charged in Counts Five, Eight, Eleven, Twelve and Thirteen that, upon their conviction of any of such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 924, including but not limited to: (i) one .380 Walther semiautomatic pistol bearing serial number S039632, (ii) one .40 caliber Beretta semiautomatic pistol with a defaced serial number, (iii) one .380 caliber Ruger semiautomatic pistol bearing serial number 372256324 and (iv) one .40 caliber Sig Sauer semiautomatic pistol with a defaced serial number, all seized on or about December 3, 2021 in Brighton Beach, Brooklyn, New York.

20. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON


BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2021R01073
FORM DBD-34
JUN. 85

No. 22-cr-106 (S-1) (LDH)

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

MARCUS RICKETTS, also known as "Darnell Dogan," "Conroy Cornelius" and
"Blaise," MARK GOULBOURNE, also known as "Short Man," JUVANIE
CROSSGILL, also known as "Geo," JONATHAN GOULBOURNE, also known as
"Bobcat," ROMEO JONAS, also known as "Tee," AMARI WEBBER, also known
as "Smooth," and CHEVONNE WILLIAMS, also known as "Chevy,"
Defendants.

SUPERSEDING INDICTMENT

(T. 18, U.S.C., §§ 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 924(d)(1),
924(j)(1), 981(a)(1)(C), 1512(c)(1), 1512(c)(2), 1951(a), 3, 2 and 3551 *et seq.*; T.
21, U.S.C., §§ 841(a)(1), 841(b)(1)(B)(vii), 841(b)(1)(C), 841(b)(1)(D), 846,
853(a) and 853(p); T. 28, U.S.C., § 2461(c))

A true bill.


Foreperson

Filed in open court this _____ day, _____ of _____ A.D. 20____

Clerk

Tara McGrath & Chand Edwards-Balfour, Assistant U.S. Attorneys